

The inclusion of AM (A-3) mode bandwidth restrictions by the petitioners of RM-10740 was unfortunate and not well thought out. While SSB is the overwhelmingly dominant mode of modern HF amateur radio, and therefore has the most extreme potential for bandwidth abuse, this is not the case for the AM mode.

The overwhelming majority of amateur HF AM mode operation occurs only on band plan designated spot frequencies and segments, so that there is very limited potential for interference.

Further, the vast majority of amateur HF AM mode equipment in regular use on the air today is of vintage military or commercial origin. The restorers and operators of this equipment, of necessity, develop and maintain a high level of electronic technical capability, which is one of the chief aims of the amateur service.

Finally, the restrictions that RM-10740 proposes for HF AM bandwidth are technically inapplicable to vintage AM gear, since the bandwidth of such equipment is established by R-C filtration with a 6 or at best 12 db/octave roll-off. Imposition of a 5.6 KHz absolute bandwidth is technically not achievable with such equipment.

Overall, I feel that RM-10740 proposes to solve a potential rather than an actual problem. The existing rules and regulations of the service provide adequate enforcement grounds wherever actual abuse occurs.

Respectfully, Bruce E. Stock AB7YD